

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability
Litigation,

No. MDL 15-02641-PHX-DGC

Lisa Hyde and Mark E. Hyde, a married
couple,

No. CV-16-00893-PHX-DGC

Plaintiff,

v.

PROPOSED VERDICT FORM

C. R. Bard, Inc., a New Jersey corporation;
and Bard Peripheral Vascular, Inc., an
Arizona corporation,

Defendants.

We, the jury, duly empaneled and sworn in the above entitled action, upon our oaths, find as follows:

A. LIABILITY

1. Do you find by the greater weight of the evidence, to a reasonable certainty, that Bard is liable to Mrs. Hyde on the strict product liability design defect claim?

_____ Yes _____ No

2. Do you find by the greater weight of the evidence, to a reasonable certainty, that Bard is liable to Mrs. Hyde on the negligent design claim?

_____ Yes _____ No

1 If you answered "No" to each question in Part A, do not complete Parts B or C.
2 If you answered "Yes" to either question in Part A, please complete Parts B and C.

3
4 **B. COMPENSATORY DAMAGES**

5 1. If you found Bard liable to Mrs. Hyde on either of the claims set forth
6 above, what amount of damages do you find will reasonably compensate Mrs. Hyde for
7 her injuries?

8 \$_____

9
10 2. Do you find by the greater weight of the evidence, to a reasonable certainty,
11 that Mr. Hyde sustained a loss of consortium?

12 _____ Yes _____ No

13
14 3. If you answered "Yes" to Question B.2, then answer this question.
15 Otherwise do not answer it. What amount of damages do you find will reasonably
16 compensate Mr. Hyde for his loss of consortium?

17 \$_____

18
19 **C. PUNITIVE DAMAGES**

20 Do you find by clear, satisfactory, and convincing evidence, to a reasonable
21 certainty, that punitive damages should be awarded against Bard?

22 _____ Yes _____ No

23
24
25
26 _____
27 Presiding Juror Number

26 _____
27 Date